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January 26, 2024

VIA ECF

Hon. Barbara C. Moses Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, New York 10007

> A.G., et al. v. New York City Department of Education Re: 23-cv-8968 (JMF)(BCM)

Application GRANTED. SO ORDERED.

Barbara Moses

United States Magistrate Judge January 26, 2024

Dear Magistrate Judge Moses:

This firm represents the Plaintiffs in the above action. Plaintiffs brought this action as undisputed prevailing parties seeking attorneys' fees, costs and expenses under the fee shifting provision of the Individuals with Disabilities Education Act (IDEA), 20 U.S.C. §1400, et seg.

Plaintiffs submit this letter requesting an adjournment of the current briefing scheduling set by the Court's November 20, 2023 Order (Dkt. No. 17). The parties have been in active settlement negotiations.

At this time we are requesting additional time for the submission of Plaintiffs' Motion for Summary Judgment. Plaintiffs' propose the following schedule:

- Motion for summary judgment due by April 2, 2024
- Defendant's opposition due by May 2, 2024
- Plaintiffs' reply due by May 23, 2024

Defendants consent to Plaintiffs' request and the above schedule.

Thank you for your time and consideration.

Respectfully submitted,

Attorney for the Plaintiffs

Cc: Marina Moraru, Esq. (via ECF) Iesha Sumerall Eromosele, Esq. (via ECF)